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each a Debtor and Debtor-in-Possession*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11
: :
: Case No. 19-12346 (SHL)
LIDDLE & ROBINSON, L.L.P.,¹ :
: (Jointly Administered with Case No. 19-
Debtor : 10747)
----- X

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
In re : Chapter 11
: :
: Case No. 19-10747(SHL)
JEFFREW LEW LIDDLE, :
: (Jointly Administered with Case No. 19-
Debtor : 12346)
----- X

NOTICE OF AGENDA FOR OMNIBUS HEARING

Time and Date of Hearing: November 26, 2019 at 2:00 p.m. (EDT)

Location of Hearing: United States Bankruptcy Court for the Southern District of New
York, before the Honorable Sean H. Lane, United States Bankruptcy
Judge, **Room 701**, One Bowling Green, New York, New York 10004

¹ The last four digits of Liddle & Robinson, L.L.P.'s taxpayer identification number are 6440.

PLEASE TAKE NOTICE that an agenda with respect to all matters set for hearing on **November 26, 2019 at 2:00 p.m. (EDT)** is set forth below. Copies of each pleading identified below can be viewed and/or obtained by: (i) accessing the Court's website at www.nysb.uscourts.gov, or (ii) contacting the Office of the Clerk of Court at One Bowling Green, New York, New York 10004. Note that a PACER password is required to access documents on the Court's website.

AGENDA

I. DEBTOR LIDDLE & ROBINSON, L.L.P.'S CONTESTED MATTERS

A. Debtor's Motion for Entry of Interim and Final Orders Pursuant to 11 U.S.C. §§ 105, 361, 362, 363 and 507, Rules 2002, 4001 and 9014 of the Federal Rules of Bankruptcy Procedure (1) Authorizing Use of Cash Collateral, (2) Granting Adequate Protection, (3) Modifying the Automatic Stay, and (4) Scheduling a Final Hearing [19-12346 ECF No. 5]

1. **Related Documents:**

- (i) Debtor's Notice of Revised Budget for use of cash collateral with respect to Debtor's Motion for Entry of Interim and Final Orders Pursuant to 11 U.S.C. §§ 105, 361, 362, 363 And 507, Rules 2002, 4001, and 9014 of the Federal Rules of Bankruptcy Procedure (1) Authorizing Use of Cash Collateral, (2) Granting Adequate Protection, (3) Modifying the Automatic Stay, and (4) Scheduling a Final Hearing [19-12346 ECF No. 23]
- (ii) Objection to Motion by Debtor to (i) Extend Deadline to File Schedules, (ii) Use Cash Collateral, (iii) Retain Professionals, and (iv) Implement Procedures for Interim Compensation (related document(s) 3, 4, 5, 6, 7, 8, 9, 10) [19-12346 ECF No. 25]
- (iii) Interim Order (1) Authorizing Use of Cash Collateral, (2) Granting Adequate Protection, (3) Modifying the Automatic Stay, and (4) Scheduling a Final Hearing [19-12346 ECF No. 30]
- (iv) Second Interim Order (1) Authorizing Use of Cash Collateral by Liddle & Robinson, LLP, (2) Granting Adequate Protection, (3) Modifying the Automatic Stay, and (4) Scheduling a Final Hearing [19-12346 ECF No. 46]
- (v) Third Interim Order (1) Authorizing Use of Cash Collateral by Liddle & Robinson, LLP, (2) Granting Adequate Protection, (3) Modifying the Automatic Stay, and (4) Scheduling a Final Hearing [19-12346 ECF No. 81]

- (vi) Fourth Interim Order (1) Authorizing Use of Cash Collateral by Liddle & Robinson, LLP, (2) Granting Adequate Protection, (3) Modifying the Automatic Stay, and (4) Scheduling a Final Hearing [19-12346 ECF No. 108]
- (vii) Proposed Fifth Interim Order (1) Authorizing Use of Cash Collateral by Liddle & Robinson, LLP, (2) Granting Adequate Protection, (3) Modifying the Automatic Stay, and (4) Scheduling a Final Hearing [19-12346 ECF No. 132]

- 2. **Status:** Going forward on an interim basis with respect to Liddle & Robinson, LLP.

II. DEBTOR JEFFREY LEW LIDDLE’S CONTESTED MATTERS

- A. Objection by Counsel Financial II LLC, LIG Capital LLC, and Counsel Financial Holdings LLC to Debtor’s Claims of Exempt Property Pursuant to Bankruptcy Rule 4003 [19-10747 ECF No. 118]

- 1. **Related Documents:**

- (i) Summary of Assets and Liabilities and Certain Statistical Information, Schedule C [19-10747 ECF No. 56]
- (ii) Notice of Hearing to Consider Objection to Debtor’s Claim of Exempt Property [19-10747 ECF No. 119]
- (iii) Response of Debtor to Objection by Counsel Financial II LLC, LIG Capital LLC, and Counsel Financial Holdings LLC to Debtor’s Claims of Exempt Property, Pursuant to Bankruptcy Rule 4003, and for Related Relief [19-10747 ECF No. 186]
- (iv) Reply by Counsel Financial II LLC, LIG Capital LLC, and Counsel Financial Holdings LLC to Debtor’s Response to the Objection to Debtor’s Claims of Exempt Property [19-10747 ECF No. 206]

- 2. **Status:** Going forward with respect to Jeffrey Lew Liddle.

III. DEBTOR LIDDLE & ROBINSON, L.L.P.’S UNCONTESTED MATTERS

- A. Debtor’s Motion for Entry of an Order Extending the Debtor’s Exclusive Period to File a Chapter 11 Plan and Solicit Acceptances Thereof Pursuant to Section 1121 of the Bankruptcy Code [19-12346 ECF No. 124]

- 1. **Status:** Going forward with respect to Liddle & Robinson, L.L.P.

IV. DEBTOR LIDDLE & ROBINSON, L.L.P'S ADJOURNED ITEMS

- A. Motion by Creditor Michael Barr to Lift Automatic Stay [19-12346 ECF No. 54]
1. **Related Documents:**
 - (i) Affirmation in Support of Motion of Michael Barr for Entry of and Order Lifting the Automatic Stay [19-12346 ECF No. 55]
 - (ii) Notice of Adjournment of Hearing to Consider the Motion to Lift Automatic Stay by Creditor Michael Barr [19-12346 ECF No. 86]
 - (iii) Notice of Adjournment of Hearing to Consider the Motion to Lift Automatic Stay by Creditor Michael Barr [19-12346 ECF No. 122]
 2. **Status:** Motion has been adjourned by consent of all parties until the December 19, 2019 omnibus hearing.
- B. Motion by Counsel Financial II LLC, LIG Capital LLC, and Counsel Financial Holdings LLC, to Convert this Chapter 11 Reorganization to a Chapter 7 Liquidation [19-12346 ECF No. 103]
1. **Related Documents:**
 - (i) Notice of Adjournment of Hearing to consider Motion by Counsel Financial II LLC, LIG Capital LLC, and Counsel Financial Holdings LLC, to Convert this Chapter 11 Reorganization to a Chapter 7 Liquidation [19-12346 ECF No. 126]
 2. **Status:** Motion has been adjourned by consent of all parties until the December 19, 2019 omnibus hearing

V. DEBTOR JEFFREY LEW LIDDLE'S ADJOURNED ITEMS

- A. VW Credit, Inc.'s Motion for Relief from Automatic Stay Pursuant to 11 U.S.C. Section 362(d)(1) & (2) [19-10747 ECF No. 77]
1. **Status:** Motion has been adjourned by consent of all parties until the December 19, 2019 omnibus hearing.
- B. Motion by M&T Bank for Relief from Stay re: 560 Main Street, Southampton Town, NY 11978 [19-10747 ECF No. 107]
1. **Related Documents:**
 - (i) Memorandum of Law in Support of Motion for Relief from Stay re: 560 Main Street, Southampton Town, NY 11978 [19-10747 ECF No. 108]

2. **Status:** Motion has been adjourned by consent of all parties until the December 19, 2019 omnibus hearing.

C. Motion by Creditor Michael Barr to Lift Automatic Stay **[19-10747 ECF No. 168]**

1. **Related Documents:**

- (i) Affirmation in Support of Motion of Michael Barr for Entry of and Order Lifting the Automatic Stay **[19-10747 ECF No. 169]**
- (ii) Notice of Adjournment of Hearing to Consider the Motion to Lift Automatic Stay by Creditor Michael Barr **[19-10747 ECF No. 193]**
- (iii) Notice of Adjournment of Hearing to Consider the Motion to Lift Automatic Stay by Creditor Michael Barr **[19-10747 ECF No. 230]**

2. **Status:** Motion has been adjourned by consent of all parties until the December 19, 2019 omnibus hearing.

D. Motion by Counsel Financial II LLC, LIG Capital LLC, and Counsel Financial Holdings LLC, to Convert this Chapter 11 Reorganization to a Chapter 7 Liquidation **[19-10747 ECF No. 207]**

1. **Related Documents:**

- (i) Notice of Adjournment of Hearing to consider Motion by Counsel Financial II LLC, LIG Capital LLC, and Counsel Financial Holdings LLC, to Convert the Liddle & Robinson, L.L.P Chapter 11 Reorganization to a Chapter 7 Liquidation **[19-10747 ECF No. 231]**

2. **Status:** Motion has been adjourned by consent of all parties until the December 19, 2019 omnibus hearing.

Dated: November 22, 2019
New York, New York

Respectfully submitted,

/s/ Alison D. Bauer

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